



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, N.Y. 10007

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

ALEXANDRA CORSI  
*Senior Counsel*  
Tel.: (212) 356-3545  
Fax: (212) 356-3509  
acorsi@law.nyc.gov

December 22, 2023

**BY ECF**

Honorable Ona T. Wang  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Patricia Rodney v. City of New York, et al.*, 22 CV 1445 (LAK) (OTW)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and a supervising attorney in the Special Federal Litigation Division. As Your Honor is aware, earlier this evening, the undersigned submitted a letter requesting additional time, until January 22, 2024, for the City to assign a new attorney to this matter so the attorney has sufficient time to familiarize themselves with the case, meet and confer with Plaintiff's counsel on the outstanding discovery and thereafter provide the Court with a status letter and proposed schedule to complete any such remaining discovery. *See* Docket Entry No. 152.

Within a half hour of filing that letter, Plaintiff's counsel, Remy Green, contacted the undersigned to note that in addition to the above, there were two additional deadlines today including, (1) defendant's deadline to respond to Plaintiff's second set of document demands and interrogatories; and (2) defendant's deadline to file a protective order with respect to certain discovery issues. As Your Honor is aware, the undersigned's application of earlier today specifically noted that due to the abrupt need to transfer this case, the undersigned was unable to determine all the precise discovery issues that were currently outstanding and/or due today. Accordingly, it was my hope that the letter I filed earlier today, which specifically requested, among other things, additional time for the newly assigned attorney to meet and confer with Plaintiff's counsel to determine any remaining discovery, would encompass an extension to resolve *any and all* outstanding discovery issues, now, to also specifically include these two issues – the potential need for a protective order and the second set of discovery demands.

Accordingly, and to avoid any confusion, it is respectfully requested that those two deadlines, the deadline for defendant to move for a protective order and defendant's deadline to respond to plaintiff's second set of discovery demands, be similarly included as part of defendant City's extension request made at Docket Entry No. 152. Plaintiff's counsel stated that they have no objection to this request, and the undersigned apologizes for the multiple letters filed today.

Again, we sincerely apologize for any inconvenience and delay this has caused the Court, the parties and counsel, and thank the Court for its consideration.

Respectfully submitted,

*/s/ Alexandra Corsi*

Alexandra Corsi

*Senior Counsel*

Special Federal Litigation Division

cc: **By ECF**  
Remy Green, Esq.  
Attorney for Plaintiff